

Objection Deadline: August 25, 2008 at 4:00 p.m. (prevailing Eastern time)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606
(312) 407-0700
John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler

- and -

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
(212) 735-3000
Kayalyn A. Marafioti
Thomas J. Matz

Attorneys for Delphi Corporation, et al.,
Debtors and Debtors-in-Possession

Delphi Legal Information Hotline:
Toll Free: (800) 718-5305
International: (248) 813-2698

Delphi Legal Information Website:
<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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NOTICE OF PRESENTMENT OF JOINT STIPULATION AND
AGREED ORDER ALLOWING PROOFS OF CLAIM NUMBERS 808,
1544, 1546, 2364, 5102, 7235, 7367, 7369, 7459, 8024, 8029, 8030, 8718, 8791,
9789, 9795, 10184, 10385, 11447, 15447, 16377, 16446, 16542, AND 16544
ASSERTED BY CONTRARIAN FUNDS LLC

PLEASE TAKE NOTICE that on the dates listed in column B on Exhibit A (titled "Date Filed") attached hereto, the proofs of claim (the "Proofs of Claim") listed in column A on Exhibit A (titled "Proof of Claim Number") were filed by the parties (collectively, the "Claimants") listed in column C on Exhibit A (titled "Party Filing Proof of Claim") against certain debtor entities listed in column G on Exhibit A (titled "Debtor Named on Proof of Claim") asserting claims (collectively, the "Claims") in the amounts listed in column E on Exhibit A (titled "Asserted Amount").

PLEASE TAKE FURTHER NOTICE that each of the Claimants other than Contrarian Funds LLC and its subsidiaries and affiliates ("Contrarian") assigned their interest in the Claims to Contrarian pursuant to a Notice of Transfer.

PLEASE TAKE FURTHER NOTICE that the Debtors objected to the Proofs of Claim pursuant to the Debtors' omnibus claims objections identified in column F on Exhibit A (titled "Omnibus Claims Objection").

PLEASE TAKE FURTHER NOTICE that the Debtors and Contrarian have agreed to settle the Claims and because the Claims asserted in the Proofs of Claim involve ordinary course controversies or pursuant to the Amended And Restated Order Under 11 U.S.C. §§ 363, 502 And 503 And Fed. R. Bankr. P. 9019(b) Authorizing Debtors To Compromise Or Settle Certain Classes Of Controversy And Allow Claims Without Further Court Approval (Docket No. 8401), the Debtors and Contrarian have (i) entered into a settlement agreement (the "Settlement Agreement") and (ii) executed a Joint Stipulations And Agreed Order Compromising And Allowing Proofs Of Claim Numbers 808, 1544, 1546, 2364, 5102, 7235, 7367, 7369, 7459, 8024, 8029, 8030, 8718, 8791, 9789, 9795, 10184, 10385, 11447, 15447,

16377, 16446, 16542, And 16544 Asserted By Contrarian Funds LLC (the "Joint Stipulation"), a copy of which is attached hereto as Exhibit B.

PLEASE TAKE FURTHER NOTICE that if timely written objections are filed, served, and received in accordance with this notice, a hearing to consider approval of the Joint Stipulation will be held on September 4, 2008, at 10:00 a.m. (prevailing Eastern time) in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that if no written objections to the Joint Stipulation are timely filed, served, and received, the Debtors will present the Joint Stipulation to the Bankruptcy Court for consideration on August 26, 2008.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Joint Stipulation must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Claims Objection Procedures Order, (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 632, New York, New York 10004, and (e) be served upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: General Counsel) and (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Att'n: John Wm. Butler, Jr., John K. Lyons, and

Joseph N. Wharton), in each case so as to be received no later than 4:00 p.m. (prevailing Eastern time) on August 25, 2008.

Dated: New York, New York
August 19, 2008

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

By: /s/ John Wm. Butler, Jr.
John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606
(312) 407-0700

By: /s/ Kayalyn A. Marafioti
Kayalyn A. Marafioti
Thomas J. Matz
Four Times Square
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